

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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BANDALI DAHDAH,)	
Plaintiff)	
)	
v.)	
)	
)	
PEACETIME, LLC,)	
WAIL KHOURY and)	
JULIETTA KHOURY,)	
Defendants)	
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Civil Action No.

Complaint

Background & Statement of Facts

This is Bandali Dahdah's request for relief.

1. This is a claim against Peacetime, LLC, Wail Khoury and Julietta Khoury (hereinafter Defendants), seeking monetary damages in the amount of \$500,000 plus punitive damages plus interest and expenses, for failure to make repairs to the property per the Burlington Board of Health letter of Aug. 3, 2012 to Peacetime LLC. Diversity of Parties applies as the Khourys are residents of the United Kingdom. As a result of that failure and as a result of the failure of Peacetime to address the same issues I brought about to them in an email almost 5 years ago requiring repairs to the property that if not done would cause injuries., I have been seriously injured on Columbus Day by having the

steps to the back porch shear off and collapse on me, causing me to tumble on my back down 12 flights of stairs, which also broke my watch and phone.

2. The aforementioned property is owned by Wail Khoury's company, Peacetime, LLC. Peacetime, LLC is a limited liability corporation incorporated in Delaware, United States of America
3. Wail Khoury, thru Peacetime, LLC purchased the property on July 1, 2002 in the total amount of \$600,000. Wail Khoury has many ties to the United States including real estate investments all over the United States and is a Director and sits on the Board of Directors of Interaudi Bank in New York City. Wail Khoury is a limited partner of Delma Associates, L.P. having contributed \$2,050,000 in 1990. Delma Associates is a private equity investment business organized under the laws of the state of Delaware, with its principal place of business in New York City. It was formed for the purpose of operating and investing in real estate in the United States and Canada. Wail Khoury has made frequent trips to the United States to attend board meeting for Delma in New York and Morganti (construction company that at one time he was a board member) in Connecticut. He has recently been sued in The Supreme Court of New York where personal jurisdiction over Wail Khoury in the United States was established by the court and Wail Khoury came to the United States and gave testimony in that matter in June 2008.
4. Mrs. Julietta Khoury resides in the United Kingdom with her husband, Wail Khoury, and four children at 24 Holland Villas Road, London W14 8DH. She has been a resident of the United Kingdom since at least 1990 having left Kuwait during Iraq's invasion of

Kuwait. Three of her four children were born in the United States (she made specific trips to the United States so that her children can acquire US Citizenship) and she has maintained a bank account in Maryland for over 20 years.

5. I, Bandali Dahdah currently reside at the 1 Mulberry Lane property with my wife and two daughters since 2002.
6. This court has found in a prior case against Peacetime and the Khourys, Civil Action No. 08-CA-11391-PBS that specific jurisdiction applies to all Defendants.

Grounds for Lawsuit

The principal grounds upon which this lawsuit is made is based, are as follows:

Dahdah suffered injuries on the property as a result of negligence of behalf of all Defendants.

- a. Fraud and deceit by Peacetime, LLC, Wail Khoury and Julietta Khoury against Bandali Dahdah and Elizabeth Dahdah

- b. **FIRST CAUSE OF ACTION**

- c. (Personal Injury)

Plaintiff BANDALI DAHADH alleges as follows:

7. Plaintiff repeats and re-alleges each and every allegation contained in all the above paragraphs inclusive, as though fully set forth herein.

8. Defendants, and each of them, by their conduct, actions or omissions did individually, as agents or employees, in concert with others, cause Bandali Dahdah to suffer serious personal injury.

9. As a direct and proximate result of the negligent acts by Defendants, BANDALI DAHDAH has suffered physical harm and injuries including severe back pain, as well as mental distress, emotional harm, emotional distress, fear, apprehension of harm, mental anguish, fear, stress, and/or mental and emotional suffering and physical pain and is entitled to an award to be proven at trial.

10. That as a result of the conduct, actions, inactions, and/or omissions of the Defendants, and each of them, all of which were malicious, oppressive, and/or committed with the conscious and reckless disregard for the rights, safety, health, and/or life of BANDALI DAHDAH is entitled to an award of exemplary and punitive damages in an amount to be determined at trial.

Plaintiff alleges this Count against Defendant Peacetime, LLC and Defendant Wail Khoury and Juiletta Khoury

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

11. Plaintiff repeats and re-alleges each and every allegation contained in all the above Paragraphs inclusive, as though fully set forth herein.

12. Defendants intentionally inflicted severe emotional distress by way of extreme and outrageous conduct on Plaintiff BANDALI DAHDAH.

13. Defendants set the conditions, directly and/or indirectly facilitated, ordered, acquiesced, confirmed, ratified and/or conspired with others to inflict emotional distress on Plaintiff BANDALI DAHDAH.

THIRD CAUSE OF ACTION

(Negligent Infliction of Emotional Distress)

14. Plaintiff repeats and re-alleges each and every allegation contained in all the above Paragraphs inclusive, as though fully set forth herein.

15. Defendants breached a duty to Plaintiff at the scene of the assault and battery and infliction of bodily injury.

16. Defendants' negligence directly harmed Plaintiff BANDALI DAHDAH.

Plaintiff alleges this Count against Defendant Peacetime, LLC and Defendant Wail Khoury and Juiletta Khoury

Defendant Peacetime, LLC , and Defendant Wail Khoury are jointly and severally liable on this Count.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff demands judgment against the Defendants as follows:

- A. Enter a judgment against the Defendants awarding the Plaintiff compensatory damages for which the Defendants are jointly and severally liable.
- B. Plaintiff seeks the costs and disbursements of this action.
- C. Grant the Plaintiff the requested TRO and Preliminary Injunction to prevent further harm to Plaintiff and such other relief as this Court deems proper and just.

JURY REQUEST

The Plaintiff hereby requests a trial by jury on all issues so triable.

Date: October 10, 2012
Burlington, MA 01803

Respectfully submitted,

____/Bandali Dahdah
Bandali Dahdah
Pro Se
1 Mulberry Lane
Burlington, MA 01803
Tel: 781-696-2990

Dated: October 10, 2012